

EXHIBIT A

From: [Jefferies, Tyler](#)
To: ["Nia Holston"](#)
Cc: [Bret Grote](#)
Subject: RE: [EXTERNAL] Re: Hassan Tucker v. John Wetzel, et al - Entry of Appearance
Date: Thursday, November 7, 2024 2:29:25 PM
Attachments: [Executed Tucker Confidentiality Agreement \(1\).pdf](#)
[TUCKER.DEF_000015-000016 ATTORNEY'S EYES ONLY 4-30-2020 Roster 2-10 Shift.pdf](#)
[TUCKER.DEF_000017-000018 ATTORNEY'S EYES ONLY RRL Vote Sheet.pdf](#)
[TUCKER.DEF_000001-000008 4.27.20 Medical Records.pdf](#)
[TUCKER.DEF_000009-000010 ATTORNEY'S EYES ONLY 4-27-2020 Roster 2-10 Shift.pdf](#)
[TUCKER.DEF_000011-000012 ATTORNEY'S EYES ONLY 4-28-2020 Roster 2-10 Shift.pdf](#)
[TUCKER.DEF_000013-000014 ATTORNEY'S EYES ONLY 4-29-2020 Roster 2-10 Shift.pdf](#)

Hi Nia,

I apologize for my delay. Attached are the documents per the executed confidentiality agreement, which has also been attached.

Best,
Tyler Jefferies

Tyler Jefferies (She/Her)
Deputy Attorney General
PA Office of Attorney General: Civil Law Division
15th Floor, Strawberry Square
Harrisburg, PA 17120
o: 717-775-5161
m: 717-941-0376
tjefferies@attorneygeneral.gov

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From: Nia Holston <nia@alcenter.org>
Sent: Thursday, November 7, 2024 12:55 PM
To: Jefferies, Tyler <tjefferies@attorneygeneral.gov>
Cc: Bret Grote <bretgrote@alcenter.org>
Subject: Re: [EXTERNAL] Re: Hassan Tucker v. John Wetzel, et al - Entry of Appearance

Good afternoon Tyler,

Any update on these documents?

All the best,

Nia

On Mon, Oct 21, 2024 at 11:09 AM Nia Holston <nia@alcenter.org> wrote:

Good morning Tyler - my apologies for the delay. Please find the signed agreement attached.

Best,
Nia Holston

On Sat, Oct 12, 2024 at 8:02 AM Nia Holston <nia@alcenter.org> wrote:

Thank you Tyler - I will review and follow up with any questions.

On Fri, Oct 11, 2024 at 10:00 AM Jefferies, Tyler <tjefferies@attorneygeneral.gov> wrote:

Ms. Holston,

We have determined that a confidentiality agreement is required before we can produce the unredacted relevant documents. Attached to this email is a draft of the confidentiality agreement. Please return a sign copy as soon as practicable.

Best,
Tyler Jefferies

Tyler Jefferies (She/Her)
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From: Jefferies, Tyler
Sent: Sunday, October 6, 2024 9:44 AM
To: 'Nia Holston' <nia@alcenter.org>
Cc: Bret Grote <bretgrote@alcenter.org>
Subject: RE: [EXTERNAL] Re: Hassan Tucker v. John Wetzel, et al - Entry of Appearance

Hello,

I have no objection to the request for extension. As to the exhibits, I will need to discuss with my client as some of the documents were redacted for security purposes

and deliberative process privilege.

Best,
Tyler Jefferies

Tyler Jefferies (She/Her)
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From: Nia Holston <nia@alcenter.org>
Sent: Thursday, October 3, 2024 2:52 PM
To: Jefferies, Tyler <tjefferies@attorneygeneral.gov>
Cc: Bret Grote <bretgrote@alcenter.org>
Subject: Re: [EXTERNAL] Re: Hassan Tucker v. John Wetzel, et al - Entry of Appearance

Good afternoon,

I am following up on the previous message.

Thank you,

Nia Holston

On Tue, Oct 1, 2024 at 12:24 PM Nia Holston <nia@alcenter.org> wrote:

Dear Ms. Jefferies,

I am following up on Mr. Hassan Tucker's matter, 1:22-cv-00631. As you know, I am representing Mr. Tucker in this case. I understand that Judge Conner's order requires us to complete mediation within 60 days of his August 12 order. I would like to file a motion for extension by 60 days so that I have time to complete my record review. Can you let me know if you have any objection to this request?

Additionally, there are some materials in the summary judgment filings that are redacted. Are you able to send the unredacted versions of these documents?

Thank you,

Nia Holston

On Wed, Sep 4, 2024 at 8:32 AM Jefferies, Tyler <tjefferies@attorneygeneral.gov> wrote:

Good Morning Ms. Holston,

Thank you for your email. Mr. Barrett's email is Joe_Barrett@pamd.uscourts.gov. I look forward to working with you on this matter.

Best,
Tyler Jefferies

Tyler Jefferies (She/Her)

Deputy Attorney General
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From: Nia Holston <nia@alcenter.org>

Sent: Tuesday, September 3, 2024 11:55 AM

To: Jefferies, Tyler <tjefferies@attorneygeneral.gov>

Cc: Bret Grote <bretgrote@alcenter.org>

Subject: [EXTERNAL] Re: Hassan Tucker v. John Wetzels, et al - Entry of Appearance

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Additionally - do you have an email address for the assigned mediator Joseph Barrett? Thank you very much.

On Tue, Sep 3, 2024 at 11:42 AM Nia Holston <nia@alcenter.org> wrote:

Good morning Mr. Jefferies,

I hope this message finds you well. I am writing to inform you that I will be

entering my appearance in Tucker v. Wetzel, No. 1:22-cv-631 shortly. I will also reach out to the mediator to request a delay in the mediation process. Please feel free to reach out to me via email or phone (267-357-0948) with any questions or concerns.

Thank you very much,

Nia

--

Nia Holston
Staff Attorney
Abolitionist Law Center
nia@alcenter.org

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